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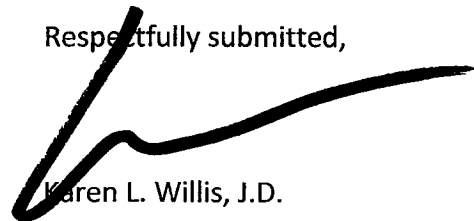
February 12, 2018

**DOCKETING OF DECEMBER 7, 2017 MOTION TO INTERVENE, TRO AND MOTION TO
VACATE**

Per the request of Hon. Judge Cathy Siebel, the following papers dated December 7, 2017, is hereby docketed:

- *Memorandum of Law to Vacate or Modify;
- *OSC to Permit Intervention or Modify TRO;
- *Declaration of Brian Caplan;
- *Declaration of Karen Willis;
- *Declaration of Sal Michaels

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Karen L. Willis, J.D.', written over the typed name.

Karen L. Willis, J.D.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CAN'T STOP PRODUCTIONS, INC.,

Plaintiff,

-against-

SIXUVUS, LTD., ERIC ANZALONE,
ALEXANDER BRILEY, FELIPE ROSE, JAMES
F. NEWMAN, RAYMOND SIMPSON, and
WILLIAM WHITEFIELD,

Defendants.
-----X

Civil Action No.
17-cv-06513-CS

**[PROPOSED] ORDER TO
SHOW CAUSE TO PERMIT
INTERVENTION AND TO
VACATE OR MODIFY
TEMPORARY
RESTRAINING ORDER
AND RELATED RELIEF**

Upon the Declaration of Karen Willis sworn to on the 7th day of December, together with the exhibits annexed thereto, the Declaration of Sal Michaels sworn to on the 7th day of December, the Declaration of Brian D. Caplan sworn to on the 7th day of December, and the exhibits annexed thereto, the memorandum of law in support and the proposed pleading submitted herewith, and the pleadings herein, and good and sufficient cause appearing therefore, it is hereby:

ORDERED, that the above named parties show cause before this Court before the Hon. Cathy Seibel, in Courtroom 621 of the U.S. District Courthouse, 300 Quarropas Street, White Plains, New York 10601, on the ____ day of December, 2017, at ____ o'clock in the ____ noon thereof, or as soon thereafter as counsel may be heard, why an order should not be issued (i) pursuant to Rule 24(a)(2) of the Federal Rules of Civil Procedure granting leave to Karen Willis d/b/a Harlem West Entertainment ("Intervenor") to intervene as of right, or in the alternative, permissively under Rule 24(b)(1), as a plaintiff/counterclaim-defendant in this action; (ii) pursuant to Rule 65(b)(4) of the Federal Rules of Civil Procedure, vacating and

dissolving the temporary restraining order issued by this Court on December 1, 2017 [Docket No. 37] (“TRO”) and ordering expedited discovery herein, or, alternatively, modifying the TRO to strike the second paragraph thereof and replace it with the following: “ORDERED, that, sufficient reason having been shown therefor, pending further order of the Court, Defendant Sixuvus Ltd. (“Sixuvus”) can perform as “SIXUVUS presents Felipe Rose and Alexander Briley, former members of the legendary Village People, and company”; and (iii) granting Intervenor a preliminary injunction enjoining Defendants and their agents, servants, employees, officers, directors, attorneys, successors and assigns, including, but not limited to, the administrators of the “Official Village People” social media accounts, Carlos Keyes and Red Entertainment Agency, during the pendency of this action from using social media or other forms of communications to attack Intervenor’s “Village People” group or Victor Willis, or to otherwise interfere with or attempt to interfere with concert performances that such group has been engaged to perform at; it is

ORDERED, that, sufficient reason having been shown therefor, Karen Willis d/b/a Harlem West Entertainment be and hereby is granted leave to intervene as a plaintiff/counterclaim-defendant in the instant action; it is

ORDERED that, sufficient reason having been shown therefor, pursuant to Rule 65(b)(4) of the Federal Rules of Civil Procedure, the TRO is hereby dissolved or, in the alternative, modified such that the second paragraph of the TRO is stricken and the following language shall constitute the second paragraph thereof: “ORDERED, that, sufficient reason having been shown therefor, pending further order of the Court, Defendant Sixuvus Ltd. (“Sixuvus”) can perform as “SIXUVUS presents Felipe Rose and Alexander Briley, former members of the legendary Village People, and company”; and it is

ORDERED that, sufficient reason having been shown therefor, pending the hearing of Intervenor's application for a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, Defendants and their agents, servants, employees, officers, directors, attorneys, successors and assigns, including, but not limited to, the administrators of the "Official Village People" social media accounts, Carlos Keyes and Red Entertainment Agency, are temporarily restrained and enjoined from using social media or other forms of communications to attack Intervenor's "Village People" group or Victor Willis, or to otherwise interfere with or attempt to interfere with concert performances that such group has been engaged to perform at;

ORDERED that service by federal express overnight delivery of a copy of this Order to Show Cause to Permit Intervention and to Vacate or Modify Temporary Restraining Order, together with a copy of the papers on which it is based, by ___ p.m. on the ___ day of December, 2017, upon the Plaintiff's counsel, Eisenberg Tanchum & Levy LLP, 707 Westchester Avenue, Suite 300, White Plains, New York 10604, and upon Defendants' counsel, Adelman Matz P.C., 780 Third Avenue, 14th Floor, New York, New York 10017, shall be deemed good and sufficient service thereof; and it is further

ORDERED, that answering papers be served on Reitler Kailas & Rosenblatt LLC, 885 Third Avenue, 20th Floor, New York, New York 10022, and filed with the Court on or before _____ on the ___ day of December, 2017, and that Intervenor's reply papers be served on Plaintiff's and Defendants' counsel and filed with the Court on or before the ___ day of _____, 201__.

DATED: White Plains, New York
 December __, 2017

UNITED STATES DISTRICT JUDGE